

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Annual Assessment of the Status of)	MB Docket No. 12-203
Competition in the Market for the)	
Delivery of Video Programming)	

**COMMENTS OF
Worcester Community Cabel Access, Inc. (WCCA TV Herein)**

WCCA TV 13 submits these comments in response to the above-captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming.”

Please ensure that existing non-profit PEG public access community television centers and facilities receive funding and material support to sustain and expand the scope of their missions.

[To the extent possible, please respond fully to the following questions. It is not necessary to answer every question. Rather, the goal is to inform the Commission on how PEG services are delivered in your community. In your answer to #1, please include the name(s) of the MVPD operator(s) in your jurisdiction.]

1. Charter Communications provides three access channels to the City of Worcester, one channel is used for PUBLIC ACCESS television service WCCA TV 13.

2. These channels are placed on the lowest tier of cable provided. If residents only have analog television sets they require a digital converter box to receive this basic service this service does not provide for community public access PEG channels.
3. There are more channels carried since June of 2006.
4. Unfortunately our provider does not allow for distribution of our programming throughout the region. Outside of Worcester, residents must navigate to our web site to view our programming schedule, though we can provide all necessary data required for inclusion on an on-screen program guide.
5. Charter Communications runs it's own commercial channel in the lower teir, which competes directly with our public access channel. Charter often requires exclusivity rights limiting opportunities for some to use the public access channels to promote certain public events, such exclusivity requirements discourages use of the public access channel and process.
6. WCCA TV public access facility serves as a community media center a place where anyone who lives, works or studies in Worcester can particiapte in a free flow of local news , information, views and opinions, in an open and non-discriminatory basis. The stations programming includes year round after school youth media training, digital video technology training classes, provides and facilitates community television production, and provides space for community meetings. It's an institutional community resource since 1986. More programs are produced on our local public access than all the channels combined on the cable tiers. There is no other commercial or public venue that produces and presents such a diversity of and volume of content, covering many languages and topics. Recent funding cutbacks made at the discretion of the city

administration have devastated our capacity to facilitate youth voices and servilely limits our ability to reach and encourage community use. Mandates must be made to secure guarantees for PEG channels to flourish and in addition, as a free speech venues, would be subject to the political whim or retribution. This can be easily addressed by use of proper language to ensure funding and capital support as well as access to all broadband means for our PEG channels.

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September 10, 2012